

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

| | | |
|---------------------------------------|---|-------------------|
| IRON WORKERS' MID-AMERICA |) | |
| PENSION PLAN, <i>et al.</i> , |) | |
| |) | |
| Plaintiffs, |) | |
| |) | CIVIL ACTION |
| vs. |) | |
| |) | NO. 18 C 4124 |
| SECURITY FENCE CO., INC., |) | |
| a dissolved Illinois corporation, and |) | JUDGE JOHN Z. LEE |
| |) | |
| JEFFREY H. COLE, d/b/a SECURITY |) | |
| FENCE CO., INC., |) | |
| |) | |
| Defendants. |) | |

MOTION FOR ENTRY OF JUDGMENT

Plaintiffs, by and through their attorneys, default having been entered against the Defendants on August 14, 2018, request this Court enter judgment against Defendants, SECURITY FENCE CO., INC., a dissolved Illinois corporation, and JEFFREY H. COLE, d/b/a SECURITY FENCE CO., INC. In support of that Motion, Plaintiffs state:

1. On August 14, 2018, this Court entered default against Defendants and granted Plaintiffs' request for an order directing Defendants to turn over monthly fringe benefit contribution reports for the period January 2018 forward. The Court also entered an order that judgment would be entered after Defendants submitted the required contribution reports and Plaintiffs determined the amount due and owing from Defendants.

2. On or about August 15, 2018, Defendants submitted monthly fringe benefit contribution reports for the period January 2018 through July 2018 to Plaintiff Funds. Defendants

also remitted full payment of the fringe benefit contributions due thereon. (See Affidavit of Joseph J. Burke).

3. Due to the untimely payment of the fringe benefit contributions due from Defendants for the period January 2018 through July 2018, Plaintiff Funds assessed liquidated damages in the total amount of \$502.56. (Burke Aff. Par. 5).

4. In addition, Plaintiffs' firm has expended the amount of \$446.00 in costs and the amount of \$1,314.00 in attorneys' fees, for a total of \$1,760.00. (See Affidavit of Catherine M. Chapman).

5. Based upon the documents attached hereto, Plaintiffs request entry of judgment against Defendants in the total amount of \$2,262.56.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment against Defendants in the amount of \$2,262.56.

/s/ Patrick N. Ryan

Patrick N. Ryan
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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Motion for Entry of Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participants on or before the hour of 5:00 p.m. this 5th day of September 2018:

Mr. Jeffrey H. Cole, Registered Agent
Security Fence Co., Inc.
2022 S. Griswold
Peoria, IL 61605-3003

Mr. Jeffrey H. Cole
2022 S. Griswold
Peoria, IL 61605-3003

/s/ Patrick N. Ryan _____

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